REMARKS

Reconsideration of this application in light of the present amendment and remarks is respectfully requested.

Claims 1-25 have been rejected.

Claims 1-10, 12, 13 and 23-25 have been amended.

Claims 1-25 are pending in this application.

Claims 1, 9-11, 18 and 25 have been rejected under 35 U.S.C. §102(e) as being anticipated by Jagadeesan (US 7,003,298). This rejection is respectfully traversed.

Claim 1 has been amended to state that all of the plurality of connections are forwarded from the first to the second communication system. Support for this can be found on page 17 lines 4-6. Claim 1 has been further amended to reflect that placing connections on hold, is directed by the second communication system. Support for this can be found on page 17 lines 16-18. Claim 1 has also been amended to include claim 2 and to recite that any one of the held connections can be switched to the active state while placing the active connection on hold. Further support for this can be found on page 17 lines 28 to page 18 line 4.

Advantageously, applicant's invention provides a technique for switching a plurality of connections from one multi-connection communication system to another communication system that only supports a single connection. This is accomplished by placing all but one connection on hold while maintaining contact, then switching the held connections between the one active handover connection in accordance with various parameters in accordance with the present invention. Further, the connections are maintained such that handing back from the second to first system is readily accomplished

Jagadeesan discloses a technique to handover a single connection from one communication mode to another communication mode while keeping the connections active. However, Jagadeesan does not disclose how to solve the problem of handling a plurality of connections, as recited in amended claim 1. Further, Jagadeesan does not suggest or disclose the placing of all but one of the plurality of connections on hold while handing over the one active connection. Jagadeesan does not disclose placing a connection on hold at all. Jagadeesan specifically describes keeping both the connections actively transmitting data or dropping one of the connections (abstract, col. 7 line 63 to col. 8 line 15), which teaches away from applicant's holding condition. Therefore, Jagadeesan could not have envisioned switching the one handover connection between active and held connections, as recited in amended claim 1. Jagadeesan is missing at least the following elements of applicant's invention; a) a plurality of connections, b)

-8-

forwarding the plurality of connections between systems, c) holding all but one of the connections, and d) switching the held connections one-at-a-time to the active handover connection. As a result, applicant respectfully submits that amended claim 1 is novel over Jagadeesan.

Regarding claims 9 and 10, although Jagadeesan (col. 7 lines 35-45) describes handoff signals between devices, as is well known in the art, applicant submits that this is a completely different concept from notifying a *user* of the subscriber unit with a message that one of their connections is on hold (see text on page 22 lines 27-32). Moreover, Jagadeesan does not describe a plurality of connections, and does not describe a "hold" function (as detailed above), and therefore could not have envisioned notifying a user that one of a plurality of connections is on hold.

Regarding claim 11, although Jagadeesan (col. 7 lines 25-30) describes voice communication, as is well known in the art, applicant submits that this is a completely different concept from notifying a *user* of the subscriber unit with a voice message that one of their connections is on hold (see text on page 22 lines 27-32). Moreover, Jagadeesan does not describe a plurality of connections, and does not describe a "hold" function (as detailed above), and therefore could not have envisioned notifying a user that one of a plurality of connections is on hold. Further, claim 11 is dependent upon claim 9, incorporated by reference, as is therefore distinct for the same reasons.

Independent claim 25 has been amended to include the same recitations as those of claim 1, in apparatus form, as is therefore deemed novel as well for the same reasons.

Therefore, applicant respectfully requests that the above rejection be withdrawn.

Claims 3-8 and 12-14 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Jagadeesan in view of Tellinger (US 6,792,273). This rejection is respectfully traversed.

Claim 4 has been amended to reflect that the first connection selected for active handover is determined by an error rate of that connection. Support for this can be found in claim 6, wherein this element has been subsequently removed. Neither Jagadeesan nor Tellinger, in combination or alone, disclose choosing one of a plurality of connections for handover based on error rate.

Regarding claim 6, neither Jagadeesan nor Tellinger, in combination or alone, disclose choosing one of a plurality of connections for handover based on priority, transaction identifier, or time of setup.

Regarding claims 7 and 8, the Examiner admits that Jagadeesan does not disclose storing data. However, although Tellinger discloses storing data in memory, this is not in response to a connection being in a "hold" state, but is instead a diversity technique, which is completely

-9-

different. Neither Jagadeesan nor Tellinger, in combination or alone, disclose placing one of a plurality of connections in hold, and therefore could not have envisioned the further step of placing information from a held connection in memory.

Moreover, claims 3-8 and 12-14 are dependent on amended claim 1, and therefore include all of the recitations of claim 1, which are not disclosed or suggested by the references.

Accordingly, it is respectfully submitted that this rejection has been overcome.

Claims 16, 17 and 19-24 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Jagadeesan in view of Parmar et al. (US 6,725,039). This rejection is respectfully traversed.

Claim 23 has been recast to reflect that a failed handover connection to the first system can easily be re-established if the first system has maintained control of the connection. Support for this can be found on page 23 lines 20-23 and page 24 lines 6-8. Neither Jagadeesan nor Parmar, in combination or alone, disclose a first system maintaining control of held connections in a second system.

Moreover, claims 16, 17 and 19-24 are dependent on amended claim 1, hereby incorporated by reference, and are therefore deemed patentable and distinct from the cited art for the same reasons.

Accordingly, it is respectfully submitted that this rejection has been overcome.

Claims 2 and 15 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Jagadeesan in view of Bedingfield, Sr. et al. (US 5,850,606). This rejection is respectfully traversed.

Claim 2 has been amended to reflect that all of the connections eventually get passed to the subscriber through a multiplexing scheme. Support for this can be found on page 18 lines 18-22. Neither Jagadeesan nor Bedingfield, in combination or alone, disclose a plurality of connections, placing these connections on hold, and multiplexing. Therefore, this art could not have envisioned multiplexing a plurality of held connections onto one active handover connection.

Moreover, claims 2 and 15 are dependent on amended claim 1, hereby incorporated by reference, and are therefore deemed patentable and distinct from the cited art for the same reasons.

Accordingly, it is respectfully submitted that this rejection has been overcome.

The other references of record have been reviewed and applicant's invention is deemed patentably distinct and nonobvious over each taken alone or in combination.

-10-

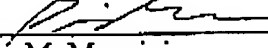For the foregoing reasons, applicants respectfully request that the above rejections be withdrawn.

Inasmuch as this amendment distinguishes all of the applicants' claims over the prior art references, for the many reasons indicated above, passing of this case is now believed to be in order. A Notice of Allowance is earnestly solicited.

No amendment made was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim, unless applicant has argued herein that such amendment was made to distinguish over a particular reference or combination of references.

Authorization is hereby given to charge any fees necessitated by actions taken herein to Deposit Account 50-2117.

Respectfully submitted,
Ban Al-Bakri

Customer Number 22917
Motorola, Inc.
Law Dept. - 3rd floor
1303 E. Algonquin Rd.
Schaumburg, IL 60196

By: _____
Brian M. Mancini
Attorney for Applicant(s)
Registration No. 39,288
Phone: (847) 576-3992
FAX: (847) 576-3750

-11-